

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Newport News Division

UNITED STATES OF AMERICA,

v.

NOE MEDRANO NUNEZ,

Defendant.

Docket: 4:25-cr-00007-RAJ-RJK-1

DEFENDANT’S UNOPPOSED MOTION TO CONTINUE

JURY TRIAL AND RESET FOR PLEA HEARING

NOW COMES the Defendant, Noe Medrano Nunez, by and through counsel, Eric Leckie, Esquire, and hereby moves this Honorable Court to continue the jury trial date in the above-captioned case set for June 4, 2025 to a date amenable to the Court and all parties for a plea hearing. In support of this motion, the following is stated:

1. The matter is currently set for a jury trial on June 4, 2025 at 10:00 a.m.
2. The defendant’s counsel and the Assistant United States Attorney, Ms. Devon Heath, have reached an agreement that the defendant will plead guilty and no longer desires a jury trial.
3. However, due to the novel nature of this case, the specific terms of the plea agreement are still being drafted and reviewed by the United States Attorney’s Office and this continuance will allow additional time for the final drafting and approval of the plea agreement for endorsement by the defendant and the United States Government.

4. The defendant consents to counsel's recommendation for a continuance of the jury trial date to be reset for a plea hearing date.
5. Finally, the defendant's counsel has consulted with Ms. Heath, and the United States Government has no objection to the proposed continuance.

WHEREFORE, the Defendant, Noe Medrano Nunez, by counsel, respectfully moves this Honorable Court for entry of an order continuing the current scheduled jury trial date and reset for a plea hearing.

NOE MEDRANO NUNEZ
By Counsel

_____/s/_____
Eric Leckie

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CERTIFICATE OF SERVICE

I hereby certify that on the 27th of May, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

_____/s/_____
Eric Leckie

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